

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460



OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

August 7, 2014

VIA EMAIL

Dr. Cisse Spragins
Chief Executive Officer
Rockwell Labs Ltd
1257 Bedford Avenue
North Kansas City, MO 64116

Subject: Label Amendment – Clarification of Marketing Claims and Logos in Response to
Agency-Initiated Action
Product Name: Green Zone Granular Bait
EPA Registration Number: 73079-6
Application Date: May 12, 2014
Decision Number: 489766

Dear Dr. Spragins:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is **acceptable**.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

SEE NEXT PAGE

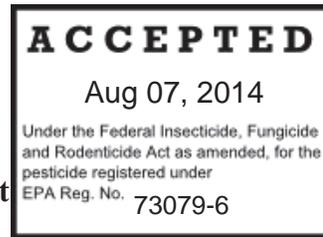
Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). If you have any questions, please contact Michael Walsh by phone at (703) 308-2972, or via email at "walsh.michael@epa.gov".

Sincerely,

A handwritten signature in black ink that reads "Mark ES". The "M" is large and stylized, followed by "ark" in a smaller, cursive script. To the right, the initials "ES" are written in a large, bold, cursive font.

Mark Suarez, Product Manager 13
Insecticide Branch
Office of Pesticide Programs

NOTE: Bold italicized text is information for the reader and not part of the label.
[Bracketed information is optional text.] Text separated by / denotes and / or options.



Green Zone™ Granular Bait

ABN: InTice™ 10 Perimeter Bait™

ABN: Maggie's Farm™ Simply Effective™ Snail, Slug and Insect Bait

Kills Roaches, Crickets, Mole Crickets, Sowbugs, Pillbugs, Earwigs, Silverfish, Millipedes, Snails, Slugs and Ants*

*Except Pharaoh ants, Carpenter ants, Fire ants, Harvester ants

Active Ingredient: Orthoboric Acid.....10%
Other Ingredients:.....90%
Total:.....100%

EPA Reg. No.: 73079-6
EPA Est. No.: (as applicable)
Net Contents: 1.2/8 oz /1/2/4/5/10/20/40/50 lbs

KEEP OUT OF REACH OF CHILDREN CAUTION

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals: CAUTION: Harmful if absorbed through the skin. Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. In the State of California: Personal Protective Equipment (PPE) Applicators and handlers must wear: shoes plus socks.

First Aid

If in Eyes: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first five minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

If on Skin or Clothing: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

Have the product or label with you when calling a Poison Control Center or doctor or going for treatment. In case of emergency, for additional information call 800 858 7378.

Environmental Hazards: Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high-water mark. Do not contaminate water when disposing of equipment washwaters or rinsate.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Use Restrictions: In food areas of restaurants, residential, health care, educational, daycare, agricultural buildings, animal rearing and handling establishments, food handling and food processing establishments, this product may only be applied as a crack and crevice treatment. Any product remaining outside of cracks and crevices must be cleaned up and removed.

Application Directions

Use Sites: In and around residential, multi-family, commercial, industrial, municipal, institutional, research, recreational, health care, educational, daycare, hospitality and agricultural buildings and other man-made structures, garages, home greenhouses, transport vehicles, sewers, animal rearing and handling establishments

and food handling and food processing establishments. Turf sites include lawns, landscape beds, ornamental turf, parks, playing fields, right-of-ways, golf courses and home greenhouses.

Outdoor Application: Apply bait evenly over the affected area using a hand shaker or mechanical spreader at a rate of 1 lb per 1000 square feet or 45 lbs per acre. The product should not be watered in. For mole cricket treatments, results will be best if the area is irrigated prior to bait treatment. Mole crickets typically come to the surface to feed in the evening. Individual ant mounds may be treated by sprinkling 1/2 oz of product around each mound. Repeat treatment as needed. Apply bait early in the season in areas likely to be infested, such as flower, fruit and vegetable gardens, on ornamental turf and ground cover vegetation, and around shrubs. In home greenhouses, apply bait at a rate of 3 oz per 100 sq ft on and under benches. Do not apply bait directly in flats or pots. Reapply as needed.

Sewer Application: Apply bait along ledges inside sewers and around manhole covers.

Indoor Application: Apply bait only in areas inaccessible to children and pets, or in tamper-resistant bait stations. Apply bait at a rate of 3 oz (2/3 cup) per 100 square feet. Using a hand shaker or duster, apply bait in attics, crawl spaces, trash closets, utility closets, dropped ceilings, on dirt or gravel cellar floors, under and behind appliances and vending machines, in wall voids and voids under and behind cabinets, sinks and tubs, in drawer wells, garbage chutes, pipe chases, elevator pits, around drains, around electrical conduits and in cracks and crevices where insects may harbor. For crack and crevice treatments, use a duster and apply 1 to 3 puffs per linear foot based on level of infestation. Focus application in areas where insects or their signs are seen. Reapply bait after one week if infestation is still present. A power duster may be used to apply bait in appropriate areas, such as attics and crawlspaces. The duster manufacturer's recommendations for settings should be followed.

Application tips for certain sites follow:

1. In attics, be sure to get bait near the eaves and vent pipes where insects often first enter, as well as around any pipes or potential access points between the attic and the main structure. Attics should have proper ventilation to insure that no food odor from the bait seeps into the living area, particularly in hot weather. If in doubt, apply the product in a manner such that it can be easily removed.
2. When treating cabinetry areas, if there is no gap between the lower cabinets and the kickplate, then small holes can be drilled to access the voids. Escutcheon plates around pipes can also be pulled back to allow access to voids.
3. The bottom drawers in kitchen and bathroom cabinets can be removed and bait dusted into drawer wells. No bait should be left exposed when drawers are replaced.
4. Electrical switch plate covers can be removed to allow access to voids, but bait should not be applied directly in electrical boxes.
5. If there are cracks between baseboards, cabinets, doorframes, hinges, counters or trim, and walls, these cracks can be lightly dusted with bait. If practical, these areas can be sealed once insect problems have been eliminated, to help prevent future problems.
6. Insects need moisture, so kitchen and bath areas and areas immediately surrounding them, and any other damp areas should be carefully inspected and treated if necessary. As a separate matter from the use of this product, it is advisable to fix any leaks to minimize structural damage and odors, and to prevent potential chronic insect problems.

To help prevent insect problems from developing in homes and similar structures, a preventative program is recommended. Once per year, apply bait in attics and crawlspaces at a rate of 8 oz per 1000 square feet.

Food Processing and Handling Establishment Application, including Federally-Inspected Meat and Poultry Plants: Follow instructions for other sites as appropriate. In food areas, only apply bait in cracks, crevices, and other inaccessible areas. Avoid contamination of food and feedstuffs. Never apply bait directly to a surface where food is stored, prepared or served. Any bait that is left visible after treatment should be swept into cracks and crevices or removed.

Storage and Disposal

Do not contaminate water, food or feed by storage or disposal.

Storage: Store in a dry place. Do not store where children or animals may gain access.

Disposal: If empty: Non-refillable container. Do not reuse or refill this container. Place in trash or offer for recycling if available. If partly filled: Call your local solid waste agency or 1-800-CLEANUP which is managed as a public-private partnership.

Optional Alternate Disposal Statement for 20 lb pail, 5 lb pail, 4 lb shaker jug, 2 lb shaker bottle, 1 lb shaker bottle, 8 oz shaker bottle or 1 lb puffer bottle:

This storage/application container may be refilled by the end-user of the product. Refill only with Green Zone Granular Bait.

Disposal: If empty: Do not reuse this container for any other purpose. Place in trash or offer for recycling if available. If partly filled: Call your local solid waste agency or 1-800-CLEANUP which is managed as a public-private partnership.

[Conditions of Warranty and Limitations of Liability

IMPORTANT: READ BEFORE USE Read the entire Directions for Use, Conditions of Warranties and Limitations of Liability before using this product. If terms are not acceptable, return the unopened product container at once. By using this product, user or buyer accepts the following Conditions, Disclaimer of Warranties and Limitations of Liability.

CONDITIONS: The directions for use of this product are believed to be adequate and must be followed carefully.

However, it is impossible to eliminate all risks associated with the use of this product. Ineffectiveness or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application, all of which are beyond the control of Manufacturer. All such risks shall be assumed by the user or buyer.

DISCLAIMER OF WARRANTIES: To the extent consistent with applicable law, Manufacturer makes no other warranties, express or implied, of merchantability or of fitness for a particular purpose or otherwise, that extend beyond the statements made on this label. No agent of Manufacturer is authorized to make any warranties beyond those contained herein or to modify the warranties contained herein. To the extent consistent with applicable law, Manufacturer disclaims any liability whatsoever for special, incidental or consequential damages resulting from the use or handling of this product. **LIMITATIONS OF LIABILITY:** To the extent consistent with applicable law, the exclusive remedy of the user or buyer for any and all losses, injuries or damages resulting from the use or handling of this product, whether in contract, warranty, tort, negligence, strict liability or otherwise, shall not exceed the purchase price paid or at Manufacturer's election, the replacement of product.]

Manufactured by: Rockwell Labs Ltd [logo]
1257 Bedford Ave
[North] Kansas City, MO 64116

[Phone number / Web address]

[© XXXX] [Trademark(s) ownership statement]

[Green Zone is not a third party certification.] *Used when Green Zone Brand logo is used.*

Marketing Claims

[For Indoor / Outdoor / [and] Turf Use]

[Mold / [and] Moisture Resistant [Bait]]

[Ready-to-Use [Bait]]

[Perimeter [Ant* / Insect] Bait™ / Granules] *Except Pharaoh ants, Carpenter ants, Fire ants, Harvester ants

Asterisk text will appear on the same panel as the claim and only if Ants are listed in the Kill claim

[Treats [up to] X sq ft] ***As factual, based upon the container size and label use rate***

[Treats [up to] X linear feet in a Y foot band] ***As factual, based upon the container size and label use rate***

[Double / Twice the active, compared to 5% orthoboric acid baits]

[WBE Woman Business Enterprise NWBOC Certified (logo)] ***As factual based on company certification***

Logo depicted below in grayscale – may be colorized in actual use

[Formulated in the USA [(logo)]] ***As applicable***

Logo depicted below in grayscale – may be colorized in actual use

[Formulated in Missouri [(logo)]] ***As applicable***

Logo depicted below in grayscale – may be colorized in actual use

[Formulated in the Heartland [(logo)]] ***As applicable***

Logo depicted below in grayscale – may be colorized in actual use

[Green Zone Brand [(logo)]]

Logo options depicted below in grayscale – may be colorized in actual use

